

receiving a work order from the requesting member identifying the
downloaded member and a destination for the work order; and
downloading the work order and the requested member from the first
set of data to the destination identified in the work order.

98. A method as defined in claim 97 further comprising the step

of:

charging a work order fee to the first data provider for downloading
the work order to the destination.

REMARKS

The applicants have carefully considered the Office action dated
March 16, 1999 and the references cited therein. By way of this Response,
claims 5, 6, 40, 41 and 78-90 have been canceled without prejudice to their
further prosecution, claims 1, 3, 4, 25-27, 30, 32-34, 36-39, 48, 61, 64, 67,
68, 70 and 71 have been amended for clarity, and new claims 91-98 have
been added for completeness. In view of the foregoing, it is respectfully
submitted that all pending claims are in condition for allowance and
favorable reconsideration is respectfully requested.

Turning to the rejections on the art, the Office action rejected claims
1-90 as being unpatentable over one or more of Vigneaux, U.S. Patent

5,852,435, Wright et al., U.S. Patent 5,426,594, Parulski, U.S. Patent 5,440,401, Ward et al., U.S. Patent 5,463,555 and Konrad, U.S. Patent 5,696,901. Applicants respectfully traverse these rejections.

Pending independent claims 1, 36 and 37 all describe data management systems that provide either a storage facility or a storage device for providing storage for digital assets of a plurality of unrelated asset provider users. The digital assets of at least a first one of the asset provider users are stored such that the digital assets of the first asset provider can only be accessed by authorized users identified by the first asset provider user and such that the digital assets of the first asset provider user are transparent to users that are not authorized to view those assets by the first asset provider user. The meaning of "transparent" is defined in the specification at page 27, line 27 - page 28, line 7 as follows:

Significantly, the digital data of every image provider user 14 is transparent to all users except those users authorized to view the data. In other words, if Image Provider A and Image Provider B have both stored data on the data management system, and Image Provider A has authorized User C to search and access its data [but Provider B has not granted User C such privileges], User C will not only be prevented from accessing the data of Image Provider B, but User C will not even be able to tell that Image Provider B has stored data on the system.

No combination of the art of record teaches or suggests a data management system providing such features. Nor does any art of record teach or suggest the combination of such a storage facility with the work order delivery system(s) specified in claims 1, 36 and 37.

For example, while the Vigneaux et al. reference discloses a digital multimedia newsroom production system that enables a number of related users to access a centralized data repository, there is no suggestion in Vigneaux et al. of providing a storage facility for unrelated asset providers wherein the digital assets of an asset provider user are transparent to unauthorized users.

Wright et al. is similarly deficient. Specifically, the Wright et al. reference teaches an electronic greeting card delivery system wherein a database of greeting cards is made available to all users. There is no discrimination between users and, thus, the Wright et al. reference cannot be said to suggest the combinations specified in claims 1, 36 and 37.

The Parulski et al. reference is directed toward a "mechanism for controlling the manner in which digitized image data files are stored on a digital data storage medium, such as a compact disc..." (Abstract, ll. 1-3). There does not appear to be any disclosure or suggestion of a storage facility or storage device shared by a plurality of unrelated users or of rendering the assets of a user of the storage facility transparent to unauthorized users.

The Ward et al. reference is directed to a "system and method for integrating a business transaction processing system with a process control system...[to provide] a computer integrated manufacturing environment." (Abstract, ll. 1-3). Again, there does not appear to be any disclosure of a storage facility providing storage for digital assets of unrelated asset provider users or of rendering the stored assets of such asset provider users transparent to unauthorized users.

The Konrad Patent appears to be similarly deficient. It is directed to providing "an illusion to a user that a desired utility service supported on a remote host resides locally on the user's local host..." (Col. 4, ll. 58-60). It does not appear to disclose a storage facility for storing digital assets of unrelated third parties or of rendering the assets of an asset provider stored on the facility transparent to users not authorized to view the assets by that asset provider.

Since all of the cited references share the noted deficiency, combining those references in any conceivable manner will also suffer from the noted deficiency. Accordingly, none of the cited art, whether taken alone or in combination, teaches or suggests the structures recited in claims 1, 36 and/or 37. As a result, claims 1, 36 and 37, as well as all claims depending therefrom, must be allowed.

Independent claim 71 is a method claim that recites steps wherein two different asset providers store digital assets on a storage device and wherein the digital assets of one of the asset providers are transparent to at least one user authorized by the second one of the asset providers to access the storage device. As discussed above, none of the art of record teaches or suggests such steps. Accordingly, claim 71 should also be allowed.

The distinctions noted above are important. In particular, the applicants have disclosed a new business model which can provide storage for digital assets of unrelated third parties and can route those assets to sites for use upon receipt of work order instructions from an authorized user. The disclosed business model provides a beneficial service wherein businesses can safely and securely store their valuable digital assets (e.g., images for use in advertising) without fear of disclosure or unauthorized use of those assets by third parties.

Independent claim 70 is directed to a different aspect of the invention. Specifically, within the context of providing a storage device for storing digital assets of a plurality of unrelated asset provider users, the digital image management and order delivery system of claim 70 includes a charge developer which assesses charges to the asset provider users. The charges are assessed based on at least one of: (a) the amount of storage memory utilized by the digital assets of the charged asset provider and (b) an

amount of time the digital assets of the charged asset provider user are stored in the storage device. No combination of the art of record teaches or suggests such a system. Accordingly, claim 70 should be allowed.

Independent claim 72 is directed toward a digital storage facility for providing storage for a plurality of third party users. Among other things, the recited storage facility includes means for compressing the digital data in accordance with a parameter set by the user storing the digital data. The Office action acknowledges the art does not teach such a step. However, despite this admission, it erroneously rejects this claim by apparently reading the claim to indicate that the digital data is received compressed from the user and stored in that compressed state. However, the Office action's interpretation ignores the express recitation of the claim that the storing means stores the digital data compressed by the compressing means which indisputably indicates that the received digital data is at least further compressed at the storage facility in accordance with a parameter provided by the user. Therefore, the strained reading of claim 72 in the Office action is in error, ignores express recitations of the claim, and cannot form the basis for rejecting claim 72.

User defined compression as defined in claim 72 is a significant feature of the disclosed third party storage facility. As clarified by dependent claims 73 and 74, the compression parameter recited in claim 72

can be a compression format or a degree of compression to be used by the storage facility to store the user's data. Since, as specified in the inventive combinations recited in dependent claims 75 and 76, charges to the user are assessed based upon the amount of memory utilized by the stored digital data, providing the third party users with the ability to set a compression parameter also provides those users with an opportunity to control the storage charges they incur.

Since none of the foregoing features are anywhere taught or suggested by Wright (no user-defined compression) or any other art of record, claim 72, and all claims depending therefrom must be allowed.

New claim 91 is also allowable. Among other things, it recites a user identifier for discriminating between users communicating with the system to control user access to the digital images stored in a storage device. In particular, the images provided by a first image provider are transparent to all users except authorized users identified by that image provider.

New claims 92-98 are also allowable. Independent claim 92 recites a method of selling on-line storage space for digital assets which, among other things, includes the steps of maintaining transparency of the digital data of a first data provider to users who are not identified by the first data provider as authorized to access the data. As discussed above, none of the cited art teaches such step. Accordingly, the combination of steps recited in claim 92

is new and non-obvious over the art of record, and claim 92 should be allowed.

Claims 93-98 all depend from claim 92. Therefore, for at least the reasons claim 92 is allowable, claims 93-98 should also be allowed.

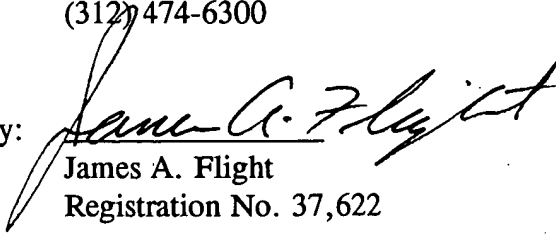
In view of the foregoing, all pending claims are in condition for allowance.

If the Examiner is of the opinion that a telephone conference would expedite the prosecution of this case, the Examiner is invited to contact the undersigned at the telephone number identified below.

Respectfully submitted,

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